

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEBRASKA**

In re Dimensions In Senior Living, LLC et al., ¹)	Case No. 22-80860
)	
Debtors.)	Chapter 11
)	
)	Joint Administered

SECOND APPLICATION FOR INTERIM APPROVAL OF FEES AND EXPENSES

COMES NOW Turner Legal Group, LLC (“Applicant”), pursuant to Fed. R. Bank. P. 2016 and Neb. R. Bank. P. 2016-1, 11 U.S.C. § 330, and the Motion to Approve Procedures for Interim Compensation and Reimbursement of Professional Fees previously entered and approved by this Court, the undersigned submits this Second Application for Interim Approval of Fee and Expense for Debtors’ Counsel.

BACKGROUND

1. On November 21, 2022, (the “Petition Date”), Debtors filed voluntary petitions for relief under chapter 11 of the Bankruptcy Code. This Court has jurisdiction over this case pursuant to 28 U.S.C. §1334. Venue is proper in this Court pursuant to 28 U.S.C. §§ 1408 and 1409. No party has requested the appointment of a trustee or examiner in the Chapter 11 Cases, and no committees have been appointed or designated.

2. On November 23, 2022, Debtors filed their *Motion To Approve Procedures For Interim Compensation And Reimbursement Of Professional Fees* at Filing No. 17, which motion was approved by this Court on December 28, 2022, at Filing No. 71 (the “Procedures”).

3. On May 17, 2023, Applicant filed its Application for Interim Approval of Fee and Expenses (the “First Application”). Filing No. 197. On July 6, 2023, the Court entered an Order approving the First Application awarding fees of \$60,412.00 and expenses of \$1,889.94. Of this amount, \$32,193.00 in fees and \$0.00 in expenses remain outstanding. Applicant possesses \$52,994.00 in trust.

4. In accordance with the Procedure, Applicant submits this Second Application for Interim Approval of Fee and Expenses of Attorney’s Fees and Expenses of actual and necessary costs and expenses incurred by Applicant as Counsel to Debtors from April 1, 2023, to June 30, 2023 (the “Period”).

5. Applicant was employed by Debtors on an hourly basis for the purpose of representing Debtors in the conduct of these Chapter 11 Case and its business affairs. Applicant was employed to perform all services as were necessary or reasonable for and on behalf of Debtors on an hourly basis, with no budget or limitation being imposed upon services rendered or fees incurred in connection therewith.

6. The names and hourly rates of all of Applicant’s attorneys, paralegals and legal assistants who billed time with respect to this case are as set forth on Exhibit “A”, as attached hereto and by this reference incorporated herein. The hourly rates reflected on Exhibit “A” are the customary and standard hourly rates for

¹ Dimensions In Senior Living, LLC, Tax I.D. No. 76-0771058, Village ridge, LLC, Tax I.D. No. 20-3042744, Village Place, LLC, Tax I.D. No. 81-2042780, Wb Real Estate Of Iola, LLC, Tax I.D. No. 46-5548614, Humboldt Assisted Living LLC, Tax I.D. No. 48-1221950, Wilcox Properties Of Columbia, LLC, Tax I.D. No. 43-1934089, Wilcox Properties Of Fort Calhoun, LLC, Tax I.D. No. 20-5822304..

such attorneys, paralegals and legal assistants. The average hourly rate charged by Applicant to Debtors during the Period ranges between \$100.00/h to \$310.00/h.

7. Attached hereto as Exhibit “A” is a break-down by project code that includes the numbers of hours spent by Applicant per ABA Bankruptcy Code project categories. A copies of a applicable invoices are set forth on Exhibit “C” attached hereto.

8. All services for which compensation is requested by Applicant were performed for and on behalf of Debtors and not on behalf of any other person. The services rendered by Applicant in this case were necessary and have aided in the collection, preservation, and sale of the assets of the estates, and the orderly administration thereof.

9. The reasonable value of the services rendered by Applicant as counsel for Debtors in this Chapter 11 case during the Period is \$31,968.50. Of this amount, \$31,968.50 remains outstanding.

10. Applicant has expended the sum of \$538.74 for actual and necessary costs and expenses incurred by Applicant as counsel to Debtors during the Period. Of this amount \$538.74 remains outstanding.

11. Set forth on Exhibit “A” is a detailed listing of Applicant’s out-of-pocket expenses incurred with reference to this case.

CASE STATUS

12. The Plans and Disclosure Statements have not yet been filed in this case. Debtors intend to file multiple plans and disclosure statements following the sale process described below.

13. To the best of Applicant’s knowledge, all UST Quarterly Fees are current and all Monthly Operating Reports have been filed.

14. On February 6, 2023, Debtors filed there: (i) *Motion For Order Approving Bidding Procedures To Be Used In Relation To The Proposed Sale Of Debtors Assets* (Filing No. 130) (the “Procedures Motion”); and (ii) their *Motion For Order Pursuant To 11 U.S.C. §§ 105(a) and 365 And fed. R. Bank p. 6006 Authorizing And Approving Procedures Governing The Assumption And Assignment Of Executory Contracts And Unexpired Leases* (Filing No. 131) (the “Assumption Motion”).

15. The Assumption Motion was approved by Order of the Court on March 10, 2023. Filing No. 154. The Procedures Motion was approved by Order of the Court on March 10, 2023. Filing No. 161.

16. During this time, Debtors’ Financial Advisor, B. Riley Advisory Services, has undertaken a substantial marketing process that is generating substantial interest in Debtors’ assets as a going concern.² As things stand, the sale process remains ongoing and Debtors are speaking with multiple parties interested in purchase some or all of Debtors’ assets. Following this sale process, Debtors intend to file one or more plans of reorganization and disclosure statements.

17. At the same time, Debtors retained the services of Paul Land and Plaza Commercial Realty to act as a licensed real estate broker to market the assets of Wilcox Properties of Columbia, LLC (“Columbia”). On September 8, 2023, Debtors filed their Amended Motion to Sell (Filing No. 254) in which Debtors sought permission to sell certain assets of Columbia to a third party (the “Sale Motion”). On October 13, 2023, the Court entered an Order granting the Sale Motion and Debtors anticipate closing this sale within the next 21 days.

² B. Riley is not, however, actively marketing the assets of Wilcox Properties of Columbia, LLC.

CONCLUSION

18. Applicant requests that the Court approve this fee application pursuant to 11 U.S.C. § 330 as fees and expenses which were reasonable, actual and necessary to the administration of the bankruptcy estate.

WHEREFORE, Debtors respectfully request that the Court enter an order: (a) granting this motion; (b) approving compensation in the amount of \$31,968.50 and approving expenses in the amount of \$538.74; and (c) granting such other and further relief as is just and proper.

Dated this 25th day of October, 2023.

By: /s Patrick Turner
Patrick R. Turner (#23461)
Turner Legal Group, LLC
14707 California Street, #1
Omaha, NE 68154
Tel: 402-690-3675
pturner@turnerlegalomaha.com

Counsel for Debtors.

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEBRASKA**

In re Dimensions In Senior Living, LLC et al.,)	Case No. 22-80860
)	
Debtors.)	Chapter 11, Joint Administered

**Exhibit "A"
SUMMARY SHEET**

1. Total Compensation and Expenses Currently Requested in this Application.
 - a. Fees – \$31,968.50 (100% Amount listed)
 - b. Expenses – \$538.74

2. Total Compensation and Expenses Previously Requested (Petition Date through March 20, 2023).
 - a. Fees – \$60,412.00
 - b. Expenses – \$1,889.94

3. Total Compensation and Expenses Previously Awarded by the Court
 - a. Fees – \$60,412.00
 - b. Expenses – \$1,889.94

4. Name and Current Billing Rate for each person who billed time during period, total hours billed, average billing rate, and total fees billed:

Timekeeper Name	Role	Work Hours	Work Rate	Work Amount
Turner, Patrick R	Attorney	92.7	\$310.00	\$28,737.00
Jenna Taylor	Paralegal	28.1	\$115.00	\$3,231.50
Total				\$31,968.50

5. Detailed listing of Applicant's out-of-pocket expenses incurred with reference to this case:

Work Date	Cost Type	Amount
06/12/2023	Printing, Postage and Mailing Fees	\$538.74

6. Project Codes.

Task-Code	Task	Work Hours	Work Amount
B110	B110 Case Administration.	22.2	\$3,957.00
B130	B130 Asset Disposition.	26.8	\$8,308.00
B140	B140 Relief from Stay/Adequate Protection Proceedings.	5.2	\$1,612.00
B160	B160 Fee/Employment Applications.	13.1	\$1,506.50
B210	B210 Business Operations.	41.8	\$12,958.00
B310	B310 Claims Administration and Objections.	11.7	\$3,627.00
Total		120.80	\$31,968.50

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FOR THE DISTRICT OF NEBRASKA**

In re Dimensions In Senior Living, LLC et al.,)	Case No. 22-80860
)	
Debtors.)	Chapter 11
)	
)	Joint Administered

Exhibit "C"

INVOICES

Turner Legal Group, LLC

INVOICE

139 S. 144TH STREET
#665
Omaha, 68010
pturner@turnerlegalomaha.com
<https://turnerlegalomaha.com/>
O: (402) 690-3675

Number	548
Issue Date	5/1/2023
Due Date	5/31/2023
Email	amyburns@dimslvg.com

Bill To:

Amy Wilcox-Burns
O: (402) 898-1079

Time Entries

Time Entries	Billed By	Rate	Hours	Sub
Time 4/3/2023 B210. Status call with Mr. Biehl re Columbia property.	Patrick Turner	\$310.00	0.10	\$31.00
Time 4/3/2023 B140. Addressing sale offers and appraisal needs.	Patrick Turner	\$310.00	0.40	\$124.00
Time 4/4/2023 B210. Reviewing property appraisals.	Patrick Turner	\$310.00	1.10	\$341.00
Time 4/4/2023 B210. Reviewing summary of reserve and maintenance and escrow accounts.	Patrick Turner	\$310.00	0.90	\$279.00
Time 4/7/2023 B140. Reviewing additional Columbia purchase offer.	Patrick Turner	\$310.00	0.20	\$62.00
Time 4/10/2023 B210. Addressing E&S fee application revisions.	Patrick Turner	\$310.00	0.40	\$124.00
Time 4/10/2023 B210. Status call with Mr. Burns.	Patrick Turner	\$310.00	0.30	\$93.00
Time 4/10/2023 B210. Status call with Ms. Taylor.	Patrick Turner	\$310.00	0.30	\$93.00
Time 4/10/2023 B140. Continuing review and analysis of appraisals.	Patrick Turner	\$310.00	1.50	\$465.00
Time 4/10/2023 B210. Preparing for and attending status conference with Mrs. Burns and Ms. Taylor.	Patrick Turner	\$310.00	1.50	\$465.00
Time 4/11/2023 B210. Addressing Storage Mart bill.	Patrick Turner	\$310.00	0.20	\$62.00

Time Entries	Document	Rate	Hours	Sub
Time 4/11/2023 B210. Status call with Mr. Biehl.	Patrick Turner	\$310.00	0.30	\$93.00
Time 4/11/2023 B210. Addressing status list with ANB including addressing process to address insurance claim and repairs.	Patrick Turner	\$310.00	0.30	\$93.00
Time 4/11/2023 B210. Addressing Farmers State Bank ACH agreement.	Patrick Turner	\$310.00	0.40	\$124.00
Time 4/11/2023 B140. Reviewing additional Columbia sale offers.	Patrick Turner	\$310.00	0.50	\$155.00
Time 4/12/2023 B210. Addressing inquiries from ANB re taxes and escrow issues.	Patrick Turner	\$310.00	0.20	\$62.00
Time 4/13/2023 B310. Addressing Deere and Co. claim resolution.	Patrick Turner	\$310.00	0.30	\$93.00
Time 4/13/2023 B210. Addressing inquiry from Mr. Whaley re sale offers on Fort Calhoun.	Patrick Turner	\$310.00	0.20	\$62.00
Time 4/13/2023 B210. Reviewing new budgets.	Patrick Turner	\$310.00	0.80	\$248.00
Time 4/13/2023 B140. Addressing Columbia sale issues.	Patrick Turner	\$310.00	0.90	\$279.00
Time 4/13/2023 B210. Reviewing MORs.	Patrick Turner	\$310.00	0.90	\$279.00
Time 4/13/2023 B210. Addressing and researching Columbia insurance policy and law re impact on property sale on insurance claim.	Patrick Turner	\$310.00	2.50	\$775.00
Time 4/14/2023 B140. Addressing new Columbia sale offer.	Patrick Turner	\$310.00	0.40	\$124.00
Time 4/17/2023 B140. Status call with Mr. Land re Columbia Sale.	Patrick Turner	\$310.00	0.10	\$31.00
Time 4/17/2023 B210. Status Call with Mr. Biehl.	Patrick Turner	\$310.00	0.20	\$62.00
Time 4/17/2023 B210. Addressing Berkadia payment inquiry.	Patrick Turner	\$310.00	0.20	\$62.00
Time 4/17/2023 B140. Addressing new Columbia sale offer.	Patrick Turner	\$310.00	0.40	\$124.00

Time Entries	Document	Rate	Hours	Sub
Time 4/18/2023 B140. Addressing new Columbia sale offer.	Patrick Turner	\$310.00	0.30	\$93.00
Time 4/18/2023 B210. Status Call with Mr. Biehl.	Patrick Turner	\$310.00	0.20	\$62.00
Time 4/19/2023 B210. Call with Ms. Taylor re MORs.	Patrick Turner	\$310.00	0.30	\$93.00
Time 4/19/2023 B210. Addressing Columbia insurance issues.	Patrick Turner	\$310.00	0.30	\$93.00
Time 4/19/2023 B210. Reviewing draft MORs for March.	Patrick Turner	\$310.00	0.60	\$186.00
Time 4/19/2023 B210. Addressing fee application issues.	Patrick Turner	\$310.00	0.70	\$217.00
Time 4/19/2023 B140. Status call with Mr. Peil re asset sale.	Patrick Turner	\$310.00	0.80	\$248.00
Time 4/20/2023 B210. Addressing and analyzing Columbia insurance issues re UST request.	Patrick Turner	\$310.00	0.30	\$93.00
Time 4/21/2023 B210. Addressing MORs.	Patrick Turner	\$310.00	1.60	\$496.00
Time 4/21/2023 B310. Analyzing Champions claim issues and possible counteraction.	Patrick Turner	\$310.00	1.80	\$558.00
Time 4/21/2023 B310. Continuing claim analysis.	Patrick Turner	\$310.00	2.90	\$899.00
Time 4/21/2023 B140. Status call with Mr. Heiman.	Patrick Turner	\$310.00	0.50	\$155.00
Time 4/21/2023 B140. Addressing Columbia sale offers.	Patrick Turner	\$310.00	0.20	\$62.00
Time 4/21/2023 B210. Addressing StoragMart issues.	Patrick Turner	\$310.00	0.20	\$62.00
Time 4/24/2023 B210. Researching and analyzing status on National Registry of Historic Buildings on BK sale.	Patrick Turner	\$310.00	2.20	\$682.00
Time 4/25/2023 B210. Addressing with Cintas re unpaid bills.	Patrick Turner	\$310.00	0.30	\$93.00

Time Entries

Document

Biller's Page

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Rate

Hours

Sub

Time 4/26/2023 B210. Continuing research re BK court jurisdiction and stay issues in continued state court litigation.	Patrick Turner	\$310.00	1.80	\$558.00
Time 4/26/2023 B140. Addressing new Columbia sale offer.	Patrick Turner	\$310.00	0.40	\$124.00
Time 4/27/2023 B210. Addressing Farmers Bank ACH issues.	Patrick Turner	\$310.00	0.20	\$62.00
Time 4/27/2023 B140. Continuing to address Columbia sale offers and issues.	Patrick Turner	\$310.00	0.50	\$155.00
Time 4/27/2023 B210. Status call with Mr. Heiman re DISL issues.	Patrick Turner	\$310.00	0.70	\$217.00
Time 4/28/2023 B140. Reviewing Broker information request.	Patrick Turner	\$310.00	0.20	\$62.00

Time Entries
Total

32.50

\$10,075.00

Total (USD)	\$10,075.00
Paid	\$0.00
Balance	\$10,075.00
I-511 Previous Balance	\$9,616.00
I-521 Previous Balance	\$14,610.94
I-533 Previous Balance	\$9,856.00
Total Outstanding	\$44,157.94

Turner Legal Group, LLC

INVOICE

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O: (402) 690-3675

Number	563
Issue Date	5/26/2023
Due Date	6/25/2023
Email	amyburns@dimslvg.com

Bill To:

Amy Wilcox-Burns
O: (402) 898-1079

Time Entries

Time Entries	Billed By	Rate	Hours	Sub
Time 4/7/2023 B160. Categorization of time entries for March for monthly fee application. Billed by Jenna Taylor.	Patrick Turner	\$115.00	0.30	\$34.50
Time 4/10/2023 B110. Meeting with PT AWB and RB to discuss outstanding issues and sale. Meeting with PT to discuss case administration and outstanding issues. Billed by Jenna Taylor.	Patrick Turner	\$115.00	1.00	\$115.00
Time 4/10/2023 B160. Emails to PT and PH regarding 1st Monthly Fee App and slight revision to the same. Billed by Jenna Taylor.	Patrick Turner	\$115.00	0.20	\$23.00
Time 4/15/2023 B110. Review and of Operating Reports for the Debtor specifically balances and AR and PL. Correction to cumulative Totals on DISL and Humboldt Operating Report. Email to PT and AWB regarding the same. Billed by Jenna Taylor.	Patrick Turner	\$115.00	1.80	\$207.00
Time 4/18/2023 B110. Review of Operating Report for Valley Ridge. Finalize reports specifically Section 5 payments to lawyers. Billed by Jenna Taylor.	Patrick Turner	\$115.00	0.80	\$92.00
Time 4/19/2023 B160. Drafting of First Interim Application. Determination of March Amounts and Categorization Totals for application. Drafting of all exhibits with calculations. Billed by Jenna Taylor.	Patrick Turner	\$115.00	3.10	\$356.50
Time 4/19/2023 B110. Conference with PT regarding Operating Reports and final revisions of the same. Billed by Jenna Taylor.	Patrick Turner	\$115.00	0.20	\$23.00
Time 4/21/2023 B160. Continuation on First Interim Fee Application. Review of UST 1996 Guidelines to aid in drafting of interim application. Additional information gathered for background and case status sections. Billed by Jenna Taylor.	Patrick Turner	\$115.00	1.20	\$138.00

Time Entries

8.60

\$989.00

Total

Total (USD)	\$989.00
Paid	\$0.00
Balance	\$989.00
I-511 Previous Balance	\$9,616.00
I-521 Previous Balance	\$14,610.94
I-533 Previous Balance	\$9,856.00
I-548 Previous Balance	\$10,075.00
Total Outstanding	\$45,146.94

Turner Legal Group, LLC

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Number	571
Issue Date	6/16/2023
Due Date	7/16/2023
Email	amyburns@dimslvg.com

Bill To:

Amy Wilcox-Burns
O: (402) 898-1079

Time Entries

Time Entries	Billed By	Rate	Hours	Sub
Time 5/1/2023 B210. Reviewing Ombudsman reports.	Patrick Turner	\$310.00	0.90	\$279.00
Time 5/1/2023 B140. Reviewing Debtor financials for sale due diligence.	Patrick Turner	\$310.00	0.90	\$279.00
Time 5/1/2023 B310. Addressing challenge of Champions judgment in Iowa court.	Patrick Turner	\$310.00	1.40	\$434.00
Time 5/1/2023 B140. Addressing sale offers re Columbia property.	Patrick Turner	\$310.00	0.30	\$93.00
Time 5/1/2023 B210. Status call with Mr. Heiman.	Patrick Turner	\$310.00	0.30	\$93.00
Time 5/2/2023 B210. Addressing Cintas post-petition services claim.	Patrick Turner	\$310.00	0.20	\$62.00
Time 5/2/2023 B310. Addressing challenge of Champions judgment in Iowa court.	Patrick Turner	\$310.00	0.60	\$186.00
Time 5/2/2023 B140. Reviewing Debtor financials for sale due diligence.	Patrick Turner	\$310.00	0.80	\$248.00
Time 5/3/2023 B210. Addressing inquiry from Mr. Burns re VP repair process.	Patrick Turner	\$310.00	0.20	\$62.00
Time 5/3/2023 B310. Addressing possible resolution of Champions claim challenge.	Patrick Turner	\$310.00	0.20	\$62.00
Time 5/3/2023 B140. Reviewing additional due diligence information re sale inquiries.	Patrick Turner	\$310.00	0.90	\$279.00

Time Entries	Document	Rate	Hours	Sub
Time 5/4/2023 B310. Addressing Deere claim issues.	Patrick Turner	\$310.00	0.30	\$93.00
Time 5/4/2023 B210. Status call with Mr. Biehl re ANB issues.	Patrick Turner	\$310.00	0.30	\$93.00
Time 5/4/2023 B140. Status call with Mr. Peil re sale.	Patrick Turner	\$310.00	0.30	\$93.00
Time 5/4/2023 B160. Final Review of First Interim Fee Application. Billed by Jenna Taylor.	Patrick Turner	\$115.00	0.80	\$92.00
Time 5/4/2023 B160. Draft of Erickson Sederstrom March Fee Application with all Exhibits and Classification of Time Entries for ABA Codes. Billed by Jenna Taylor.	Patrick Turner	\$115.00	1.80	\$207.00
Time 5/4/2023 B110. Addressing interim fee application.	Patrick Turner	\$310.00	1.20	\$372.00
Time 5/5/2023 B130. Addressing revised budgets and cash collateral stipulations.	Patrick Turner	\$310.00	2.10	\$651.00
Time 5/5/2023 B110. Addressing E&S fee application.	Patrick Turner	\$310.00	0.70	\$217.00
Time 5/5/2023 B210. Status call with Mr. Heiman.	Patrick Turner	\$310.00	0.50	\$155.00
Time 5/5/2023 B140. Reviewing revised Columbia property offer.	Patrick Turner	\$310.00	0.30	\$93.00
Time 5/8/2023 B140. Status call with Whaley.	Patrick Turner	\$310.00	0.10	\$31.00
Time 5/8/2023 B140. Reviewing status of Columbia offers.	Patrick Turner	\$310.00	0.30	\$93.00
Time 5/8/2023 B130. Addressing CC budgets and related issues.	Patrick Turner	\$310.00	0.80	\$248.00
Time 5/8/2023 B310. Addressing and reviewing Motion for Relief and possible answer to IA lawsuit and motion to Vacate IA judgments.	Patrick Turner	\$310.00	1.30	\$403.00
Time 5/8/2023 B210. Addressing response to Missouri AG civil complaint.	Patrick Turner	\$310.00	1.50	\$465.00
Time 5/9/2023 B310. Addressing order re Champions MFR and impact on IA proceedings.	Patrick Turner	\$310.00	0.70	\$217.00

Time Entries	Document	Rate	Hours	Sub
Time 5/9/2023 B210. Reviewing UST statement of UST fees and reviewing past MORs.	Patrick Turner	\$310.00	0.50	\$155.00
Time 5/9/2023 B140. Addressing ANB inquiry re status of sale.	Patrick Turner	\$310.00	0.20	\$62.00
Time 5/10/2023 B210. Addressing Debtor inquiry re repairs and improvements to facilities.	Patrick Turner	\$310.00	0.40	\$124.00
Time 5/10/2023 B140. Status call with Mr. Land re Columbia.	Patrick Turner	\$310.00	0.20	\$62.00
Time 5/10/2023 B140. Status call with Mr. Peil.	Patrick Turner	\$310.00	0.10	\$31.00
Time 5/10/2023 B140. Addressing changes to bid deadlines.	Patrick Turner	\$310.00	0.60	\$186.00
Time 5/10/2023 B130. Addressing revised CC stipulations and budgets.	Patrick Turner	\$310.00	1.20	\$372.00
Time 5/10/2023 B110. Addressing UST fees and review of operating reports for possible amendment.	Patrick Turner	\$310.00	1.50	\$465.00
Time 5/11/2023 B140. Status call with Mr. Peil and banks.	Patrick Turner	\$310.00	0.50	\$155.00
Time 5/11/2023 B310. Addressing renewed Champions MFR and hearings.	Patrick Turner	\$310.00	0.40	\$124.00
Time 5/12/2023 B210. Call with Ms. Taub re MORs and fee applications.	Patrick Turner	\$310.00	0.20	\$62.00
Time 5/12/2023 B140. Addressing Columbia sale updates.	Patrick Turner	\$310.00	0.70	\$217.00
Time 5/12/2023 B110. Status Conference with PT. Conference regarding extension on bidding procedures with PT and various creditor attorneys. Billed by Jenna Taylor.	Patrick Turner	\$115.00	0.50	\$57.50
Time 5/15/2023 B140. Addressing modifications to bidding procedures and creditor inquires re same.	Patrick Turner	\$310.00	0.90	\$279.00
Time 5/15/2023 B210. Initial review of April MORs.	Patrick Turner	\$310.00	0.90	\$279.00
Time 5/15/2023 B140. Call with Mr. Whaley re sale status.	Patrick Turner	\$310.00	0.10	\$31.00

Time Entries	Document	Rate	Hours	Sub
Time 5/15/2023 B210. Addressing inquiry from Ms. Pham re VR bank balances.	Patrick Turner	\$310.00	0.10	\$31.00
Time 5/15/2023 B140. Addressing Champions inquiry into Iowa property sale.	Patrick Turner	\$310.00	0.40	\$124.00
Time 5/15/2023 B140. Addressing inquiry from Mr. Land re Motion for Relief impact on Columbia.	Patrick Turner	\$310.00	0.30	\$93.00
Time 5/16/2023 B210. Addressing VR necessary repairs and fund request.	Patrick Turner	\$310.00	0.40	\$124.00
Time 5/16/2023 B210. Addressing Deere claim resolution.	Patrick Turner	\$310.00	0.20	\$62.00
Time 5/16/2023 B210. Reviewing revised MORs.	Patrick Turner	\$310.00	0.80	\$248.00
Time 5/16/2023 B310. Addressing sale inquiry re Helix and reviewing Helix claim for possible preference action.	Patrick Turner	\$310.00	0.80	\$248.00
Time 5/16/2023 B110. Drafts of April Operating Reports and review of supporting documents. Billed by Jenna Taylor.	Patrick Turner	\$115.00	2.00	\$230.00
Time 5/17/2023 B110. Addressing TLG and E&S fee applications.	Patrick Turner	\$310.00	1.10	\$341.00
Time 5/17/2023 B110. Status call with Ms. Taylor re fee application issues.	Patrick Turner	\$310.00	0.10	\$31.00
Time 5/17/2023 B310. Reviewing update of Champions hearing on motion to set aside.	Patrick Turner	\$310.00	0.30	\$93.00
Time 5/18/2023 B110. Status call with Ms. Taylor re fee application issues.	Patrick Turner	\$310.00	0.20	\$62.00
Time 5/18/2023 B110. Addressing possible need to amend MORs to address possible quarterly fee overpayment.	Patrick Turner	\$310.00	0.50	\$155.00
Time 5/18/2023 B210. Addressing ANB forbearance request.	Patrick Turner	\$310.00	0.90	\$279.00
Time 5/18/2023 B110. Review of case law on UST Fees and meaning of disbursements and Review of VR disbursements on Operating reports versus Profit Loss Statement. Conference with PT to discuss the same. Billed by Jenna Taylor.	Patrick Turner	\$115.00	2.30	\$264.50

Time Entries	Document	Billable By	Rate	Hours	Sub
Time 5/19/2023 B140. Addressing sale updates from Mr. Peil.		Patrick Turner	\$310.00	0.30	\$93.00
Time 5/22/2023 B110. Reviewing revised MORs.		Patrick Turner	\$310.00	0.50	\$155.00
Time 5/22/2023 B140. Addressing NDA and sale issues from new potential buyer.		Patrick Turner	\$310.00	0.20	\$62.00
Time 5/23/2023 B210. Status call with Mr. Biehl re ANB cash issues.		Patrick Turner	\$310.00	0.20	\$62.00
Time 5/23/2023 B130. Addressing status of Berkadia cc stipulation and reserve account.		Patrick Turner	\$310.00	0.20	\$62.00
Time 5/23/2023 B130. Addressing status of ANB cc stipulation.		Patrick Turner	\$310.00	0.20	\$62.00
Time 5/23/2023 B210. Finalizing and filing MORs.		Patrick Turner	\$310.00	1.40	\$434.00
Time 5/24/2023 B210. Addressing UST inquiry into daily balance of VR bank accounts.		Patrick Turner	\$310.00	0.30	\$93.00
Time 5/25/2023 B210. Addressing VR request for repairs.		Patrick Turner	\$310.00	0.30	\$93.00
Time 5/26/2023 B110. Addressing fee application.		Patrick Turner	\$310.00	0.50	\$155.00
Time 5/26/2023 B160. Drafting of April Monthly Fee App and Exhibits. Billed by Jenna Taylor.		Patrick Turner	\$115.00	1.10	\$126.50
Time 5/30/2023 B210. Status call with Mr. Burns.		Patrick Turner	\$310.00	0.40	\$124.00
Time 5/30/2023 B210. Status call with Mr. Biehl re ANB cash issues.		Patrick Turner	\$310.00	0.10	\$31.00
Time 5/30/2023 B140. Addressing and reviewing status of sale process.		Patrick Turner	\$310.00	0.20	\$62.00
Time 5/31/2023 B210. Addressing Champions claim challenge in light of court orders re stay relief.		Patrick Turner	\$310.00	0.50	\$155.00
Time 5/31/2023 B140. Addressing buyer inquiry re seller financing.		Patrick Turner	\$310.00	0.60	\$186.00

Time Entries

46.00

\$12,602.50

Total

Total (USD)	\$12,602.50
Paid	\$0.00
Balance	\$12,602.50
I-511 Previous Balance	\$9,616.00
I-521 Previous Balance	\$14,610.94
I-533 Previous Balance	\$9,856.00
I-548 Previous Balance	\$10,075.00
I-563 Previous Balance	\$989.00
Total Outstanding	\$57,749.44

Turner Legal Group, LLC

INVOICE

139 S. 144TH STREET
#665
Omaha, 68010
pturner@turnerlegalomaha.com
<https://turnerlegalomaha.com/>
O: (402) 690-3675

Number	583
Issue Date	7/7/2023
Due Date	8/6/2023
Email	amyburns@dimslvg.com

Bill To:

Amy Wilcox-Burns
O: (402) 898-1079

Time Entries

Time Entries	Billed By	Rate	Hours	Sub
Time 6/1/2023 B140. Addressing inquiry of possible ANB financing for purchaser.	Patrick Turner	\$310.00	0.30	\$93.00
Time 6/1/2023 B210. Addressing UST inquiry re Humboldt MOR.	Patrick Turner	\$310.00	0.20	\$62.00
Time 6/1/2023 B310. Continuing efforts to address Deere claim re Humboldt.	Patrick Turner	\$310.00	0.30	\$93.00
Time 6/2/2023 B130. Addressing ANB cash collateral order.	Patrick Turner	\$310.00	0.60	\$186.00
Time 6/2/2023 B310. Addressing John Deere claim resolution.	Patrick Turner	\$310.00	0.20	\$62.00
Time 6/7/2023 B140. Addressing inquiry from Mr. Land re status of Columbia property sale.	Patrick Turner	\$310.00	0.30	\$93.00
Time 6/7/2023 B210. Addressing service related issues with Stretto.	Patrick Turner	\$310.00	0.30	\$93.00
Time 6/7/2023 B210. Reviewing and analyzing Columbia insurance report and repair estimate.	Patrick Turner	\$310.00	1.20	\$372.00
Time 6/12/2023 B110. Meeting with PT to discuss status of case including sale of properties and claims. Billed by Jenna Taylor.	Patrick Turner	\$115.00	1.00	\$115.00
Time 6/12/2023 B160. Begin Drafting of May Fee Application with exhibits and Codification of Time Entries for May and Drafting of April ES Fee Application with Exhibits. Billed by Jenna Taylor.	Patrick Turner	\$115.00	1.50	\$172.50

Time Entries	Document	Billable By	Rate	Hours	Sub
Time 6/12/2023 B110. Addressing pleading service issues with Stretto.		Patrick Turner	\$310.00	0.40	\$124.00
Time 6/12/2023 B110. Reviewing fee applications.		Patrick Turner	\$310.00	0.50	\$155.00
Time 6/12/2023 B140. Addressing draft APA.		Patrick Turner	\$310.00	0.90	\$279.00
Time 6/12/2023 B210. Addressing service related issues with Stretto.		Patrick Turner	\$310.00	0.10	\$31.00
Time 6/12/2023 B210. Reviewing Gross lawsuit and impact on Debtors.		Patrick Turner	\$310.00	0.70	\$217.00
Time 6/13/2023 B130. Addressing ANB cc issues.		Patrick Turner	\$310.00	0.20	\$62.00
Time 6/13/2023 B140. Addressing status of Columbia sale and insurance claims.		Patrick Turner	\$310.00	0.60	\$186.00
Time 6/13/2023 B140. Continuing to address model APA.		Patrick Turner	\$310.00	2.20	\$682.00
Time 6/13/2023 B140. Status call with Mr. Heiman.		Patrick Turner	\$310.00	0.20	\$62.00
Time 6/13/2023 B140. Status call with Mr. Peil re DISL sale process.		Patrick Turner	\$310.00	0.30	\$93.00
Time 6/13/2023 B140. Status call with Mr. Peil re DISL sale process.		Patrick Turner	\$310.00	0.20	\$62.00
Time 6/13/2023 B210. Addressing E&S fee statement.		Patrick Turner	\$310.00	0.30	\$93.00
Time 6/13/2023 B210. Addressing inquiry from UST re quarterly fees.		Patrick Turner	\$310.00	0.20	\$62.00
Time 6/13/2023 B110. Meeting with PT. Assistance with Filing of outstanding items. Discussion of Additional open matters in the related cases.. Billed by Jenna Taylor.		Patrick Turner	\$115.00	1.00	\$115.00
Time 6/14/2023 B140. Addressing possible changes to auction date and bid deadline changes.		Patrick Turner	\$310.00	0.60	\$186.00
Time 6/14/2023 B140. Addressing sale APA.		Patrick Turner	\$310.00	1.40	\$434.00

Time Entries	Document	Billable By	Rate	Hours	Sub
Time 6/14/2023 B140. Call with Mr. Whaley re status of bidding process.		Patrick Turner	\$310.00	0.10	\$31.00
Time 6/14/2023 B210. Addressing SUT inquiry into missing Humboldt bank statements.		Patrick Turner	\$310.00	0.20	\$62.00
Time 6/14/2023 B210. Status call with Mr. Heiman re Columbia insurance issues.		Patrick Turner	\$310.00	0.50	\$155.00
Time 6/14/2023 B210. Status conference with Ms. Taylor.		Patrick Turner	\$310.00	0.40	\$124.00
Time 6/15/2023 Addressing Berkadia inquiry into site visit.		Patrick Turner	\$310.00	0.20	\$62.00
Time 6/15/2023 B210. Finalizing review and response to UST inquiry into Humboldt MOR.		Patrick Turner	\$310.00	0.20	\$62.00
Time 6/15/2023 B210. Status call with Ms. Taub re MORs and related issues.		Patrick Turner	\$310.00	0.10	\$31.00
Time 6/15/2023 B210. Status call with Ms. Taub re MORs and related issues.		Patrick Turner	\$310.00	0.20	\$62.00
Time 6/15/2023 B210. Status call with Ms. Taub re MORs and related issues.		Patrick Turner	\$310.00	0.20	\$62.00
Time 6/15/2023 B110. Meeting with AWB and RB to discuss distribution errors in Village Ridge Operating Reports. Billed by Jenna Taylor.		Patrick Turner	\$115.00	0.50	\$57.50
Time 6/16/2023 B130. Addressing Berkadia CC stipulation.		Patrick Turner	\$310.00	0.50	\$155.00
Time 6/16/2023 B140. Addressing changes to bidding procedures dates.		Patrick Turner	\$310.00	0.70	\$217.00
Time 6/16/2023 B140. Status call with Mr. Peil re DISL sale process.		Patrick Turner	\$310.00	0.20	\$62.00
Time 6/16/2023 B210. Addressing Berkadia inspection requests.		Patrick Turner	\$310.00	0.30	\$93.00
Time 6/18/2023 B.110. Review and Revision to Amended January Report for Village Ridge. Billed by Jenna Taylor.		Patrick Turner	\$115.00	0.50	\$57.50
Time 6/19/2023 B110. Review and Revisions to Amended February, March and April Reports for Village Ridge. Billed by Jenna Taylor.		Patrick Turner	\$115.00	1.30	\$149.50

Time Entries	Document	Billable By	Rate	Hours	Sub
Time 6/19/2023 B210. Reviewing revised MORs for VR.		Patrick Turner	\$310.00	0.70	\$217.00
Time 6/19/2023 B140. Addressing inquiry from NEDCO re new sale dates.		Patrick Turner	\$310.00	0.20	\$62.00
Time 6/20/2023 B140. Addressing changes to sale deadlines.		Patrick Turner	\$310.00	0.40	\$124.00
Time 6/20/2023 B310. Addressing status of Champions lawsuit and motion to set aside.		Patrick Turner	\$310.00	0.20	\$62.00
Time 6/20/2023 B210. Addressing columbia sale delay and insurance claim response.		Patrick Turner	\$310.00	0.60	\$186.00
Time 6/20/2023 B210. Reviewing recent financial statements.		Patrick Turner	\$310.00	0.90	\$279.00
Time 6/20/2023 B210. Status call with Ms. Taub re MORs and related issues.		Patrick Turner	\$310.00	0.20	\$62.00
Time 6/20/2023 B110. Review and Revisions to Cumulative Totals for May Operating Reports and Review of Supporting Documents for All Debtors. Billed by Jenna Taylor.		Patrick Turner	\$115.00	2.10	\$241.50
Time 6/21/2023 B210. Addressing Berkadia inspection issues.		Patrick Turner	\$310.00	0.30	\$93.00
Time 6/21/2023 B210. Reviewing public adjustor contract.		Patrick Turner	\$310.00	0.40	\$124.00
Time 6/22/2023 B210. Addressing issues related to USDOL and inquiry sent to Mr. Jensen.		Patrick Turner	\$310.00	0.20	\$62.00
Time 6/22/2023 B140. Planning for and holding conference call re status of Columbia sale.		Patrick Turner	\$310.00	0.90	\$279.00
Time 6/28/2023 B210. Reviewing ombudsman reports.		Patrick Turner	\$310.00	0.90	\$279.00
Time 6/28/2023 B160. Drafting of Exhibits for May Fee App and Finalized 5th Fee Application. Billed by Jenna Taylor.		Patrick Turner	\$115.00	1.70	\$195.50
Time 6/29/2023 B160. Drafting of Erickson Sederstrom May Fee App and Exhibits. Conference with PT. Billed by Jenna Taylor.		Patrick Turner	\$115.00	1.40	\$161.00

Time Entries	Billed By	Rate	Hours	Sub
Time 6/29/2023 B210. Status call with Ms. Taylor.	Patrick Turner	\$310.00	0.30	\$93.00
Time 6/29/2023 B140. Addressing possible stalking horse inquiry.	Patrick Turner	\$310.00	0.20	\$62.00
Time 6/29/2023 B210. Reviewing demand letters from ANB to guarantors.	Patrick Turner	\$310.00	0.30	\$93.00
Time Entries Total			33.70	\$8,302.00

Expenses

Expenses	Billed By	Price	Qty	Sub
Outside printing 6/12/2023 Printing and Postage	Patrick Turner	\$538.74	1.00	\$538.74
Expenses Total:			1.00	\$538.74

Total (USD)	\$8,840.74
Paid	\$0.00
Balance	\$8,840.74
I-511 Previous Balance	\$9,616.00
I-521 Previous Balance	\$14,610.94
I-533 Previous Balance	\$9,856.00
I-548 Previous Balance	\$10,075.00
I-563 Previous Balance	\$989.00
I-571 Previous Balance	\$12,602.50
Total Outstanding	\$66,590.18